

## REMARKS

This is intended as a full and complete response to the Final Office Action dated November 3, 2004, having a shortened statutory period for response set to expire on February 3, 2005. Claims 16-35 have been withdrawn by the Examiner and claims 10-15 stand rejected by the Examiner. Please reconsider the claims in the application for reasons discussed below.

### *Information Disclosure Statement*

The Examiner has not initialed indicating consideration of U.S. Publication No. 2003-0024708, which is cited in the information disclosure statement dated January 16, 2004. In addition, Applicant requests acknowledgement of the reference in the IDS filed April 2, 2004.

### *Election/Restriction*

The Examiner states that restriction to one of the following inventions is required under 35 U.S.C. § 121:

- I. Claims 10-15 drawn to a connection; and
- II. Claims 16-35 drawn to a method of expanding a connection between two expandable tubulars.

Additionally, the Examiner states that the product as claimed can be made by another materially different process which does not require expanding the connection with a radial force. The Examiner further states that claims 10-15 are constructively elected by original presentation for prosecution on the merits. In response, Applicants respectfully traverse the restriction requirement and request reconsideration of the claims that presently stand withdrawn.

Claims 10-15 are directed to an expanded wellbore connection between tubulars that includes a wire thread disposed between threads of the tubulars. Applicants submit that the expanded wellbore connection with the wire thread does require expanding a connection with a radial force and cannot be made by another materially different process. While the Examiner suggests that the wire thread may be plastically deformed

by a process such as use of a die, this fails to alleviate the required radial force used to make the expanded wellbore connection. In congruence with the foregoing, claims 16-29 claim a method of expanding a connection (*i.e.*, not deforming a wire thread plastically) between tubulars that includes providing an insert at the connection and expanding the connection with a radial force. Similarly, claims 30-35 (*which are not a method as indicated in the restriction*) are directed to an expanded tubular connection that includes an expanded female and male thread and an expanded insert disposed between the threads.

Therefore, the claims of Group I are directed to the same invention as those of Group II since they are clearly not distinct from one another. Additionally, the Examiner has indicated that the claims of Group I are directed to the same invention as the originally presented invention based on the constructive election. Consequently, the claims of Group II must also be directed to the originally presented invention. In conclusion, Applicants respectfully request reconsideration of the restriction requirement and constructive election and prosecution of the claims that presently stand withdrawn.

#### ***Claim Rejections - 35 U.S.C. §§ 102, 103***

Claims 10-13 stand rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 3,062,568, *Andresen et al.* Claim 14 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Andresen et al.* in view of U.S. Patent No. 4,140,337, *Arcella et al.* In response, Applicants canceled claims 10-15 and request consideration of the previously presented withdrawn claims based on the traversal presented above regarding the restriction requirement. Further, Applicants respectfully traverse the rejection as it may be applied to these claims.

*Andresen et al.* fails to teach, show or suggest "expanding the connection with a radial force," as recited in claim 16. Thus, Applicant submits that claim 16 and claims 17-19, which depend from claim 16, are patentable over *Andresen et al.* and requests allowance of these claims.

Additionally, *Andresen et al.* fails to teach, show or suggest "causing the insert to at least partially establish a mechanical relationship between the tubulars by expansion of the connection with a radial force," as recited in claim 20. Thus, Applicant submits

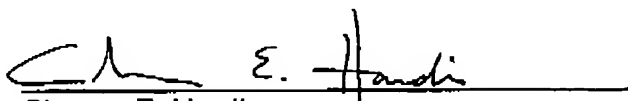
that claim 20 and claims 21-29, which depend from claim 20, are patentable over *Andresen et al.* and requests allowance of these claims.

Furthermore, *Andresen et al.* fails to teach, show or suggest an expanded tubular connection for use in a wellbore that includes an expanded insert disposed between expanded female and male threads, the insert lockingly engaging the female and male threads, as recited in claim 30. To the contrary, *Andresen et al.* teaches a thread lead without any mention of an expanded insert or expanded threads. Thus, Applicant submits that claim 30 and claims 31-15, which depend from claim 10, are patentable over *Andresen et al.* and requests allowance of these claims.

### Conclusion

The references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully requests that the claims be allowed.

Respectfully submitted,



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